

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA**

IN RE:)
) **Chapter 7**
Pro-Mark Services, Inc.)
) **Case No. 24-30167**
Debtor)
)

**NOTICE OF APPEARANCE UNDER BANKRUPTCY RULE 9010(b)
AND REQUEST FOR ALL COPIES PURSUANT TO BANKRUPTCY RULE
2002 AND ALL PLEADINGS PURSUANT TO BANKRUPTCY RULE 3017(a)**

PLEASE TAKE NOTICE that Prudent Fiduciary Services (“PFS”) and Miguel Paredes (“Paredes”) appear herein by and through their counsel, Joseph E. Lehnert of Keating Muething & Klekamp PLL, and demand that all notices given or required to be given in this case and papers served or required to be served in this case, be given to and served upon the undersigned at the following office address and telephone number:

Joseph E. Lehnert
Keating Muething & Klekamp PLL
One East Fourth Street, Suite 1400
Cincinnati, Ohio 45202
Tel: (513) 639-3929
Fax: (513) 579-6457
jlehnert@kmklaw.com

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Rule 2002(g) of the Federal Rules of Bankruptcy Procedure, the foregoing demand includes not only the notice referred to in the Rule specified above, but also includes, without limitation, notices of any application, motion, or other pleading, whether formal or informal, whether written or oral, and whether transmitted by mail, hand delivery, telephone, or facsimile: (1) that affects or seeks to affect in any rights or interests of (a) the Debtor, (b) property in which the Debtor may claim an interest, (c) property in the possession, custody or control of the Debtor, or (d) claims against the Debtor to the estates; or

(2) that seeks to require any act, payment, or other conduct by, or that in any manner affects, the rights of PFS and/or Paredes.

PLEASE TAKE FURTHER NOTICE THAT, PFS and Paredes intend that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive: (1) PFS and/or Paredes's right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (2) PFS and/or Paredes's right to a trial by jury in any proceeding so triable in this case; (3) PFS and/or Paredes's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which PFS and/or Paredes is or may be entitled, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments PFS and Paredes expressly reserve.

Respectfully submitted,

/s/ Joseph E. Lehnert
Joseph E. Lehnert
KEATING MUETHING & KLEKAMP PLL
One East Fourth Street, Suite 1400
Cincinnati, Ohio 45202
Tel: (513) 639-3929
Fax: (513) 579-6554
jlehnert@kmklaw.com
*Attorney for Creditor,
Prudent Fiduciary Services and Miguel
Paredes*

CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2024 a copy of the foregoing was served electronically through the Court's ECF System on all ECF participants registered in this case at the email address registered with the Court.

/s/ Joseph E. Lehnert

Joseph E. Lehnert

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